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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,
Plaintiff,
v.
PIROUZ SEDAGHATY,
Defendant.

CR 05-60008
MOTION REGARDING DEFENSE
ACCESS TO CLASSIFIED
DISCOVERY

Defendant, Pirouz Sedaghaty, through his attorneys, Lawrence Matasar, and Federal Public Defender Steven T. Wax, hereby moves this Court for an order:

1. directing the government to provide him a more detailed pleading regarding classified discovery than was filed on September 5, 2008;

2. permitting him to participate in the Classified Information Protection Act, 18 U.S.C. App. 3 (CIPA) Section 4 process by either:

- a. permitting him to review the classified submission under appropriate security clearances and protective orders; or
- b. file an *ex parte* pleading regarding the CIPA Section 4 process.

This motion is supported by an accompanying memorandum of Law

RESPECTFULLY SUBMITTED this 10th day of October, 2008.

/s/ Steven T. Wax

Steven T. Wax
Federal Public Defender

/s/ Lawrence W. Matasar

Lawrence W. Matasar